

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America, Plaintiff, v. Dennis E. Hecker, Defendant.	Case No. 0:10-CR-32 (01) JNE/SRN DEFENDANT'S MOTION FOR DISCLOSURE OF RULE 404(b) EVIDENCE
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Defendant, DENNIS E. HECKER, by and through his undersigned counsel, Brian N. Toder, hereby moves the Court for an order directing the government to disclose any evidence of other crimes, wrongs, bad acts, or similar course of conduct which intends to offer at trial.

This Motion is based upon the indictment, the records and files in the above-entitled action, the concurrently filed memorandum, and any and all other matters which may be presented prior to or at the time of hearing of said motion.

This motion is based upon Fed. R. Evid. 404(b), which provides in relevant part, “[u]pon request by the accused, the prosecution in a criminal case shall provide reasonable notice in advance of trial . . . of the general nature of any such evidence it intends to introduce at trial.

The defense requests that the government be compelled to make its disclosure at least 60 days prior to trial.

Respectfully submitted,

Dated: June 2, 2010

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